

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

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UNITED STATES OF AMERICA

v.

MICHAEL BERGDOLL

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CRIMINAL NO. 04-CR-30046-MAP

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DEFENDANT'S SECOND REQUEST FOR EXTENSION OF TIME
WITHIN WHICH TO SELF SURRENDER TO BUREAU OF PRISONS

Now comes the defendant in the above captioned matter and requests that this Honorable Court grant him a thirty day extension of the time within which to self surrender to the Bureau of Prisons. In support of this motion, the defendant states as follows:

1. This court has previously extended the defendant's time to report until April 28, 2007.
2. At the time the last request for extension was granted, the court also granted defendant's motion for a judicial recommendation to the RDAP program at the Allenwood complex in White Deer, PA. In addition, the defendant learned of his designation to FCI Schuylkill only days before he was supposed to report there.
3. The defendant is working with Federal Prison Consultants to have his designation changed to FCI Allenwood, but this has not been effectuated at this time.

4. Furthermore, the defendant is extensively involved in charitable events in the Greater Springfield area. He would like to remain free to finish two charitable events, both of which will be concluded by May 20.
5. The defendant therefore requests that his surrender date be extended to May 28, 2007.

THE DEFENDANT

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